

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MARK G. BULMAN)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 1:14-cv-11616
)	
SANTANDER BANK (SOVEREIGN))	
)	
Defendant)	
)	

NOTICE OF REMOVAL

**To: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF MASSACHUSETTS**

Pursuant to 28 U.S.C. §§ 1441 and 1446, the defendant Santander Bank, N.A., (“Santander”), incorrectly named as Santander Bank (Sovereign), hereby files this Notice of Removal in the above-captioned action, and sets forth below the grounds for this Notice of Removal.

1. On or about March 13, 2014, the plaintiff, Mark G. Bulman, filed a Complaint (“Complaint”) in the Massachusetts Superior Court for Suffolk County (Civil Action No. SUCV2014-00828). The plaintiff made service on Santander c/o the Secretary of the Commonwealth of Massachusetts on or about March 19, 2014.

2. The Complaint includes multiple counts alleging violations of various federal statutes including the Truth in Lending Act, the Real Estate Settlement Procedures Act, the

Consumer Credit Cost Disclosure Act as well as violations of state loan origination and servicing regulations and statutes.

3. As the plaintiff's claims are at least partially predicated on the violation of federal statutes, the United States District Court has original jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 because the plaintiff asserts "a claim or right under...the laws of the United States."

4. Venue is proper in the Eastern Division of the District of Massachusetts pursuant to 28 U.S.C. § 1391(b) and Local Rule 40.1(D) of the United States District Court for the District of Massachusetts because the property at issue is located, and the plaintiff resides, within this district.

5. Copies of all process and pleadings on file with the Superior Court of Suffolk County, Massachusetts that were served on the defendant are being filed with this Notice of Removal, and are attached hereto as Exhibit A.

6. The defendant will provide written notice of the filing of this Notice of Removal as required by 28 U.S.C. § 1446(d), including filing a copy of this Notice of Removal with the clerk of the Superior Court of Suffolk County, Massachusetts.

SANTANDER BANK, N.A.,
By its Attorneys,

/s/ Mary Ellen Manganelli
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Dated: April 1, 2014

CERTIFICATE OF SERVICE

I, Mary Ellen Manganelli, hereby certify that a true and correct copy of the foregoing document was served upon the parties via this Court's CM/ECF system or, if not registered on this Court's CM/ECF system, then via first class mail, postage prepaid, on April 1, 2014.

/s/ Mary Ellen Manganelli
Mary Ellen Manganelli

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